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Attorneys for Plaintiff,
CARLOS WILLIAMS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

CARLOS WILLIAMS,

Plaintiff,

v.

COUNTY OF SACRAMENTO; RANCHO
CORDOVA POLICE DEPARTMENT; and
DOES 1 through 50, inclusive,

Defendants.

THOMAS WILLIAMS,

Plaintiff,

v.

Case No.: 2:19-cv-02345-TLN-KJN

Case No.: 2:20-cv-00598-TLN-KJN

**JOINT STIPULATION AND ORDER TO
CONTINUE PRE-TRIAL DEADLINES**

Action Filed: October 4, 2019

Trial Date: Not Set

COUNTY OF SACRAMENTO; CITY OF
RANCHO CORDOVA; NATHAN DANIEL;
JOSEPH ZALEC; DEREK HUTCHINS and
DOES 1 through 50 inclusive,

Defendants.

Plaintiffs THOMAS WILLIAMS and CARLOS WILLIAMS (“Plaintiffs”) and
Defendants COUNTY OF SACRAMENTO, CITY OF RANCHO CORDOVA, NATHAN
DANIEL, JOSEPH ZALEC, AND DEREK HUTCHINS, (collectively “Defendants”), by and
through their (“Parties”) counsel of record, hereby stipulate and request that the Court continue
the deadlines for expert witness disclosures and supplemental expert witness disclosures for 45
days. Good cause exists for the requested continuance pursuant to Federal Rules of Civil
Procedure Rule 16(d) based upon the following:

1. On July 15, 2021, this Court consolidated the above-referenced cases with respect
to discovery only.

2. On October 5, 2021, in Case No. 2:20-cv-00598-TLN-KJN, this Court issued an
Amended Pre-Trial Scheduling Order setting forth all pre-trial deadlines. The Court entered the
same Order on October 26, 2021 in Case No. 2:19-cv-02345-TLN-KJN.

3. On April 6, 2022, this Court granted the Parties’ joint stipulation to extend the pre-
trial deadlines, which extended the fact discovery deadline to January 12, 2023.

4. On January 19, 2023, this Court granted the Parties’ joint stipulation to extend
discovery deadlines for the limited purposes of completing the defendant deputies’ depositions,
facilitating the production of records pursuant to the Court’s January 6, 2023 Order [Dkt. Nos. 43
& 48], and having Plaintiffs’ expert examine the physical camera that was in Deputy Daniel’s
vehicle on the night of the incident and subsequently removed. This Court also granted the Parties’
request to extend expert disclosure and dispositive motions dates.

5. The Parties are working diligently to prepare and gather expert reports, and agree
that more time is needed for the experts to finalize their reports.

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6. The Parties, through their respective undersigned counsel, agree and hereby do stipulate to respectfully request that the Court modify the scheduling order as follows:

| Event | Schedule | Proposed New Schedule |
|--|--|--|
| Expert Witness Disclosure | June 12, 2023 | July 27, 2023 |
| Supplemental Expert Witness Disclosure | Within 20 days after designation of expert witnesses | Within 45 days after designation of expert witnesses: September 10, 2023 |
| Dispositive Motions | November 13, 2023 | Remains unchanged |

Date: June 2, 2023

By: /s/ Kelsey K. Ciarimboli, Esq.
 LAWRENCE A. BOHM, ESQ.
 KELSEY K. CIARIMBOLI, ESQ.
 DANIEL T. NEWMAN, ESQ.
 ANGELIQUE J. RAEL, ESQ.
 GREGORY R. DAVENPORT, ESQ.

Attorneys for Plaintiffs,
 CARLOS WILLIAMS and
 THOMAS WILLIAMS

Date: June 2, 2023

By: /s/ Jennifer L. Thompson, Esq.
 CARL L. FESSENDEN, ESQ.
 JOHN R. WHITEFLEET, ESQ.
 JENNIFER L. THOMPSON, ESQ.

Attorneys for Defendant,
 RANCHO CORDOVA POLICE
 DEPARTMENT

Date: June 2, 2023

By: /s/ Van Longyear, Esq.
 VAN LONGYEAR, ESQ.

Attorneys for Defendant,
 COUNTY OF SACRAMENTO

ORDER

Good cause having been shown, based on the foregoing Stipulation by the Parties, the Court hereby ORDERS as follows:

1. The pre-trial deadlines in this case shall be amended as follows:

| Event | Schedule | Proposed New Schedule |
|--|--|--|
| Expert Witness Disclosure | June 12, 2023 | July 27, 2023 |
| Supplemental Expert Witness Disclosure | Within 20 days after designation of expert witnesses | Within 45 days after designation of expert witnesses: September 10, 2023 |
| Dispositive Motions | November 13, 2023 | Remains unchanged |

IT IS SO ORDERED.

Dated: June 2, 2023



Troy L. Nunley
United States District Judge

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